

EXHIBIT 3

July 08, 2021

STATES DISTRICT COURT
DISTRICT OF NEW YORK

SCOTT ·) Case No. 18-Civ. 12355
and as ·
representative ·
the Estate of Keren ·) VIRTUAL VIDEOTAPED
J ANNE · DEPOSITION OF DR. RIYAD
individually · MANSOUR
as personal ·
of the ·
of Keren ·
TZIPPORA ·
SCHWARZ, YOSEPH ·
SARA SHATSKY ·
MIRIAM ·)
DAVID RAPHAEL ·)
GINETTE LANDO ·)
individually ·)
as personal
of the
of Rachel
LEOR THALER,
THALER, ISAAC
HILLEL
RONIT
ARONS.
SHELLEY
EFRAT
HADASSA
Yael HILLMAN,
BRAUN, CHANA
ILAN
MIRIAM
YEHIEL
ZVI FRIEDMAN,
BELLA FRIEDMAN,

Plaintiffs,

against

July 08, 2021

PALESTINE
ORGANIZATION
THE PALESTINIAN
(a/k/a "The
Interim

and/or "The
National

Defendants.

July 08, 2021

VIRTUAL VIDEOTAPED DEPOSITION OF DR.

MANSOUR, a witness herein, called by the
for examination, taken pursuant to
Federal Rules of Civil Procedure, by and
Karen A. Nickel, a Certified Realtime
and a notary public in and for the
of Pennsylvania, held remotely
all parties appearing from their
locations, on Thursday, July 8,
at 9:30 a.m.

PRESENT:

the Plaintiffs:

F. Wick, Esq. (Admitted Pro Hae Vice)
& Gresser, LLP
Pennsylvania Avenue, NW
300
DC 20006

M. Sinaiko, Esq.
& Gresser, LLP
Third Avenue
York, NY 10022

the Defendants:

R. Berger, Esq.
Alonzo, Esq.
Kaddoura, Esq.
Patton Boggs
M Street NW
DC 20037

Cosette Vincent
Eszter Vincze

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ND EX

Mansour

By Mr. Wick.

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DESCRIPTION

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P R O C E E D I N G S

VIDEOGRAPHER:.

We are now on the record.

should be aware that this

is being recorded and, as such, all

held will be recorded unless

is a request and agreement to go off the

record.

This is the remote video-recorded

of Riyadh Today is

July 8, 2021. The time is now 13:32

time.

We are here in the matter of Shatsky

My name is Corey Wainaina, remote

technician on behalf of US Legal Support

at 90 Broad Street, New York, New York.

I am not related to any party in

action, nor am I financially interested in

At this time, will the reporter,

Nickel, on behalf of US Legal Support,

enter the statement for remote

into the record?

The attorneys

in this deposition acknowledge

I am not physically present in the

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room and that I will be reporting
deposition remotely.

They further acknowledge that, in
of an oath administered in person, the
will verbally declare his testimony in
matter is under penalty of perjury.

The parties and their counsel
to this arrangement and waive any

to this manner of Please

10. your agreement by stating your name
11. your agreement on the record.

12. This is Ron Wick,
13. and Gresser, for the Plaintiffs, and the
14. agree.

15. This is Mitchell
16. for the Defendants, we agree.

17. DR. RIYAD MANSOUR, a witness herein,
18. been first duly sworn, was examined and
19. as follows:

20. EXAMINATION

21. MR. WICK:

22. Q.. Good morning, Dr. Mansour.

23. A.. Hi.

24. Q.. I thank you for coming today.

25. A.. Welcome.

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Q.. My name is Ron I represent
in this And let me just
you off the bat, have you had your
taken before?

A.. Yes.

Q.. So you are somewhat familiar
the process but let's just -- I'm going to
you some questions, of course, but before I
that, I want to go over the process with you
10. that we are all on the same Is that
11. all right?

A.. Okay.

Q.. The court reporter will be
14. everything we say today, so to
15. sure that the record is accurate, and
16. especially since this deposition is taking
17. by a video conference, it is important
18. we not speak over each other, so that only
19. person speaks at a time.

I would ask that you please wait
21. I finish my questions before you start to
22. them, and I will do my very best to wait
23. you finish your answer before I ask
24. question.

25. Fair enough?

A.. I will do my Thank you.

Q.. It is also important that you
to my questions For example,
you shake or nod your head, the court
cannot transcribe that answer.

A.. I understand.

Q.. If you don't understand a question,
let me know, I will try to rephrase it

If you do answer a question, I will

10. that you Okay?

11. A.. Okay.

12. Q.. Your counsel, Mr. Berger,

13. will object to some of my

14. Unless your counsel instructs you

15. to answer the question, you should go ahead

16. answer my question even though there was an

17. Is that understood?

18. A.. Yes.

19. Q.. We will be taking periodic breaks

20. the If at any point you

21. a break, please let me or Mr. Berger know.

22. will do my best to accommodate your request.

23. The only thing I ask of you is that,

24. a question is pending, I would ask you

25. that question first before we take a

All right?

A.. I understand.

Q.. Are you taking any medication today
would prevent you from answering my
fully and accurately?

A.. No.

Q.. Is there any other reason that you
think of as to why you would not be able to
my questions today fully and accurately?

10. A.. No.

11. Q.. Just a few terms I want to go over
12. I will be using during the course of the
13. and I want to make sure that we are
14. on the same page.

15. I will be referring, from time to
16. to the PA, and by that I mean the
17. Authority; is that okay?

18. A.. Okay.

19. Q.. And I will use the term PLO to refer
20. the Palestine Liberation Organization;
21.

22. A.. Yes.

23. Q.. And I may use the shorthand term
24. Mission, by which I mean the Permanent
25. Mission of the State of Palestine to

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United Nations; is that all right?

A.. It is okay.

Q.. If we could go to the first

I'm going to show you a document,

Mansour.

A.. Okay.

VIDEOGRAPHER: .

you like to see the document and the

for the video record?

10. Yes, please.

11. VIDEOGRAPHER: .

12. MR. WICK:

13. Q.. I'm showing you a copy

14. a Notice that the Plaintiffs in this action,

15. clients, sent to your counsel regarding your

16. Have you seen a copy of this

17.

18. A.. No.

19. Q.. I'm sorry?

20. A.. No.

21. Q.. You have not seen a copy?

22. A.. Except now in front of me.

23. Q.. How did you learn that you

24. being asked to testify at a deposition

25. today?

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A.. By my lawyer.

Q.. I don't want you to tell me anything
you talked about in that regard with your

Is it your understanding that you are
today pursuant to this Notice of

6.

A.. Yes.

8.

Q.. Did you do anything to prepare for
deposition?

10.

A.. Yes.

11.

Q.. What did you do?

12.

A.. Met with my lawyer.

13.

Q.. And was anybody else present when

14.

met with your lawyer?

15.

A.. No.

16.

Q.. Did you meet with anybody other than
lawyer to prepare for your deposition?

18.

A.. No.

19.

Q.. And did you review any documents in
for your deposition?

21.

A.. I believe that I have seen

22.

I understood from my lawyer, that

23.

been provided to you, basically, about my

24.

25.

Q.. So you reviewed the calendar

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that were provided to us?

A.. Yes.

Q.. Do you -- to the best of your
did you review any other
in preparation for your deposition

6. today?

A.. No.

8. Q.. And when you said you met with your
to prepare for your deposition, are you
10. to Mr. Berger?

11. A.. Yes.

12. Q.. Did you meet with any other lawyers?

13. A.. Early in the process, yes, but the
14. for this deposition is with Mitch.

15. Q.. By "early in the process," do you
16. at the beginning of the lawsuit?

17. A.. When we were approached to make

18.

19. Q.. And, approximately, how long ago was

20.

21. A.. A month, month and a half ago.

22. Q.. And at that time, who did you meet

23.

24. I think Mitch can -- I don't

25. the names, Mitch can remember them.

Dr. Riyadh Mansour
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Baloul, I think, I believe, his last name.
other one I don't remember.

Q.. Mr. Baloul?

A.. Yes.

Q.. And there was another attorney as

6.

A.. Yes.

8.

Q.. Was it Mr. Alonzo?

A.. I don't remember the name.

10.

Q.. Fair And when you reviewed

11.

calendar entries that were provided to us

12.

preparing for your deposition, did those

13.

refresh your memory at all as to any

14.

events?

15.

A.. Yes.

16.

Q.. Specifically, did they refresh your

17.

as to the events in question on the

18.

calendar?

19.

A.. Calendar is very basic as to

20.

of So it refreshed my

21.

as to which meeting, with whom, so that

22.

remember, you know, these sort of -- to

23.

my memory about these things, yes.

24.

Q.. And did you bring any documents with

25.

to the deposition today?

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A. Other than the two documents
I have here.

Q. What are the two documents that you
there?

A. These two This one, this

Q. It appears to me that you are
me the copy of your calendar entries
a copy of the Defendants' revised privilege

log?

A. Yes.

Q. Is that correct?

A. Yes.

Q. I would like to just step
for just a moment and do a quick

I understand that

Nickel is in Dr. Mansour,
are you today?

A. In my office in New York, 115 East
Street, New York, New York.

Q. So you are in the Observer Mission
building?

A. Yes.

I just want to be
that we are all in agreement, per Rule 29

THESE PAGES HAVE BEEN
INTENTIONALLY OMITTED

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Ron, I really
know what you mean by "the general
You have asked a question about
something is a staff That is
acceptable to If you are asking
what the topics were that were discussed
the staff meeting, that is covered by
immunity.

MR. WICK:

10. Q.. I'm going move down to the, about
11. of the way down that first page,
12. is an entry dated February 2, 2020 and
13. subject line is interactions with civil
14. organization Beit Hanina Cultural
15. Brooklyn on UN Do you see that
16. entry?

17. A.. Yes.

18. Q.. Where did that event take place?

19. A.. In Brooklyn.

20. Q.. I apologize if I am mispronouncing

21. What is the Beit Hanina Cultural Center?

22. A.. Civil society organization.

23. Q.. What do you mean by a civil society
24. organization?

25. It is a civil society organization

the community, Palestinian-Americans, who
originally from Beit Hanina, which is a
in Jerusalem, who are residing in

5. Q.. And what is the purpose of the

7. A.. I don't really You have to
you know, the organizers of this

They are better qualified

10. Q.. To your knowledge, does the Beit
11. Cultural Center have any connection to
12. United Nations?

13. A.. So the work of the United Nations,
14. people might not know that it is not only
15. it is diplomats' involvement of
16. society organization, involvement of the
17. involvement of the missions, involvement
18. parliamentarians, involvement of so many
19. of different societies, because the way
20. UN operates, it invites so many different
21. of different societies and
22. that participate in the decision
23. process.

24. So, therefore, there are hundreds,
25. more than hundreds, civil society

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that are accredited to the United
or
COURT Excuse
please.

5. The videographer, is there some way
correcting the audio between the witness and
Berger because I'm having trouble with the
cutting out and then Mr. Berger, when
speaks, there is a lot of echoing on my end.

10. VIDEOGRAPHER: are now
11. the The time is 14:31 UTC time.
12. (Discussion held off the

13.
14. VIDEOGRAPHER: are
15. on the The time is 14:36 UTC

16.
17. MR. WICK:

18. Q. before we had to go off
19. record, you were in the middle of an answer
20. my I had asked you whether the
21. Hanina Cultural Center had any connection
22. the United Nations and you were explaining
23. the United Nations involves multiple

24.
25. Is there anything more that you

to say?

A.. Just, basically, I was saying
nature of work at the United Nations, it is
encompassing and exclusive that it allows
participation in the decisionmaking process
so many different players; representatives
countries, representatives of multicultural
civil society organizations,
parliamentarians, all components of
because the agenda of the UN, it
humanity in so many different ways.

I will give an For
when we debate climate change, that is
only the domain of diplomats, it is civil
admissions, activists, private sectors,
of them, they have a stake on this issue.

And the UN and the Secretary General
the General Assembly invite all those to
to that collective effort of all of
of how we view these issues and what we

So, therefore, everybody has
to So in this example,
civil society organization, the
they feel that they have

THESE PAGES HAVE BEEN
INTENTIONALLY OMITTED

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Q. · the next On June 30,
middle of the page, there is an entry, it
says, interview (Zoom)

Do you see that?

A.. Yes.

Q.. And what was that event?

A.. Most likely is, you know, a media

Q.. Who was the media interview with?

10 · A.. I don't It could be, you
11 · the one after I don't really know,
12 · to be precise.

13 · Q.. The next entry, which you
14 · referenced, is July 1, 2020. It says,
15 · with TRT Arabic with Nihal. What
16 · that entry signify?

17 · A.. This is an interview that was done
18 · the TRT office in London, England.

19 · Q.. Was that done virtually?

20 · A.. Yes.

21 · Q.. And where were you?

22 · A.. In the office, as far as I remember.

23 · Q.. In your office at the Observer

24 ·
25 · A.. Yes.

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Q. Then, on July 14, 2020, there is an
virtual informal meeting of the General

Do you see that?

A.. Yes.

Q.. What is the General Committee?

A.. The General Committee is a committee
the General Assembly in which it deals with
adoption of the agenda of the United

10. If any country wants to introduce a
11. item on the agenda, they go to the General
12.

13. If the General Committee approves
14. addition of that item, then the General
15. decides where to allocate that item,
16. in the General Assembly directly or one
17. the major committees of the General
18.

19. It relates to subject If it
20. an economic issue, they might decide to put
21. on the agenda of the If it is a

22. issue, then they will put it in the

23. If it is a legal issue, they will put
24. in the second, so that the General

25. that is the function of the General

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to deal with the agenda of the
Assembly.

Q. And that meeting relates to UN
correct?

A. Pardon me?

Q. That meeting related to United
business; correct?

A. Absolutely.

Q. And you participated in that meeting
your official capacity; correct?

I don't remember whether I went or I
somebody else representing me there, but we
on the agenda of the United Nations, many
related to So, therefore, we have
in the General Committee, yes.

Q. So you are not sure whether you
this meeting or not?

A. I'm not sure.

Q. Was this a non-public

It is most likely a non-public
yes.

Q. And if you attended it, it would
been in your official capacity as an

--

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A.. Absolutely.

Q.. And is there any reason in your mind
the substance of that meeting wouldn't be
to functional immunity or privilege?

A.. Can you repeat the question?

Q.. Do you know of any reason why
substance of this non-public meeting that
attended in your official capacity as

Observer, that involved UN topics,
not be privileged or subject to
immunity as some of the other items
discussed were?

That meeting, definitely, everyone
attended of the member states or Observer
as in our case, is -- it applies to --
is applies exactly to the General Assembly,
all of us would be covered, you know,
our headquarters agreement with United
of America and the United All
us would have immunity in that meeting
it is in the United Nations --

Q.. Do you know of any reason why this
wasn't included on the privilege log?

A.. No, I don't.

I can address

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and I want to put that on the record,
is the very cover page of the calendar
that it is subject to claims of functional
and jurisdictional We put
in the public calendar because it's listed
a public event in the UN's public calendar.

Thank you,

Berger.

MR. WICK:

10. Q. Let's go to the next There is
11. entry, not quite halfway down, October 22,
12. titled Zoom meeting with Do you see
13.

14. A. Yes.

15. Q. And do you know what that entry is
16. for?

17. A. Yes.

18. Q. What was that event?

19. A. It was an event with ADC, which is
20. accredited organization to the United
21. the Anti-Discrimination Committee,
22. you know, our work at the UN and
23. with those who participated from
24. side on this They invited me in
25. official capacity as the Ambassador of the

of Palestine, Permanent Observer to the
of Palestine to the United Nations.

Q. going to show you a video
we will have marked as Exhibit 7, please.

(Deposition Exhibit No. 7 was
for identification.)

(Video playing.)

MR. WICK:

Q.. Dr. Mansour, do you recognize that
10. a video of the ADC meeting described in your
11. October 22, 2020 calendar entry?

12. A.. Yes.

13. Q.. And where were you when you appeared
14. at

15. A.. In this office.

16. Q.. At your office at the Observer
17. Mission?

18. A.. Yes.

19. Q.. We can go back to the calendar.
20. was the purpose of your appearance at the
21. event, Dr. Mansour?

22. A.. It's, you know, talking about what
23. do at the United Nations, and whatever
24. that they have related to our work,
25. that time, from the point of view of their

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or those who are participating in that

3. Q. Was one of those purposes to
for the Palestinian cause?

5. A. I was invited in my capacity as the
of the State of Palestine to the
Nations, and it is my duty to exercise
observership capacities at the United

10. So it is within that context, I was
11. and within that context, I shared with
12. our view and vision.

13. Q. I'm going to ask the question again
14. I don't think that I got a clear

16. Was one of your purposes in speaking
17. the ADC to advocate for the Palestinian

19. I always advocate to the Palestinian
20. in my capacity as the Ambassador of the
21. of Palestine to the United Nations in
22. out my, and exercising my functions
23. responsibilities as an Observer of the
24. Nations.

25. Q. Just a moment, In the case

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the October 22, 2020 meeting, you were
for the Palestinian cause to the
Arab Anti-Discrimination Committee;

4.

I was advocating in my capacity and
my responsibility for those who were under
other end of the Zoom.

8.

Q.. And that was members of the ADC;

9.

10. I assume I don't know if they
11. members or what.

12. Q.. There is another entry on November
13. 2020, speak at the first convention of Beit
14. Sahour?

15. A.. Sahour. Beit Sahour.

16. Q.. Beit Sahour.

17. A.. Yes.

18. Q.. And what was that event?

19. A.. This is another civil society
20. for Palestinian-Americans. I
21. it's in And then they were
22. themselves, building an
23. and they invited me, in my
24. as the Ambassador of the State of
25. to the United Nations, to say a few

of congratulating them on the occasion of
convention, and I shared with them what
do at the United Nations.

Q.. And we have another video to show
which we would like to mark as Exhibit 8.

(Deposition Exhibit No. 8 was
for identification.)

8. (Video playing.)

MR. WICK:

10. Q.. Dr. Mansour, do you recognize that
11. a video of the speech described on your
12. 14, 2020 calendar entry?

13. A.. Yes.

14. Q.. And you gave that speech virtually;

15.

16. A.. That is correct.

17. Q.. And where were you when you gave the
18. speech?

19. A.. In this office here.

20. Q.. At the Observer Mission building?

21. A.. That is correct.

22. May I please ask

23. clarification of the record, which is,

24. showing very short clips of maybe eight

25. ten When you're asking if he

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them, I assume you're asking him if
recognizes only the clips you're showing
because we haven't seen anything more than
is that correct?

5. That is correct. I
asking if he recognizes it as an excerpt
the video.

But you are not
if he recognizes the remainder of the
10. that you weren't showing him because you
11. shown it to him and given him an
12. to comment on So I just want
13. be clear, for the record, that his answers
14. -- you're asking for answers that address
15. short clips you're showing Yes?

16. I am not clear on
17. question, Mr. The video is the

18.
19. Let me be clear
20. we can avoid some kind of trap later If
21. are planning on using portions of the video
22. you haven't shown him later on in these
23. then it's your obligation to show
24. the entirety of the video rather than just
25. clips.

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Otherwise, we object on foundational
to use of anything other than the clips
have shown him to which he has answered.

Fair We'll

back to that.

MR. WICK:

Q. Let's go to entry November 16, 2020,
from What was that event?

A.. What is the date?

10. Q.. November 16, 2020.

11. A.. This is a radio interview for media
12. I did it over the phone.

13. Q.. And where were you when you gave the
14.

15. A.. I don't really Sometimes I do
16. things while I'm in the car.

17. Q.. Were you in the United States?

18. A.. Yes.

19. Q.. I would like to back up very quickly
20. the last event we discussed, the Beit Sahour

21. Was one of your purposes in giving
22. speech to advocate for the Palestinian
23. cause?

24. A.. They approached me and they said
25. they are an establishment organization,

they want, just to say -- they invited me
my capacity as the Ambassador of the State
Palestine for the United Nations, and I
them.

Q. And was one of the reasons that you
the invitation and spoke to that group
advocate for the Palestinian cause?

8. A. Everything that I do in my capacity
the UN is advocating for the Palestinian

10.

11. Q. There is an entry on November 19,
12. titled Seton Hall University virtual talk.
13. does that entry signify?

14. A. What date is November.

15. I was invited and it was done virtually

16. Speche, if I am not mistaken, it might

17. the political science department or

18. to do with international law, Seton

19. University.

20. Again, academia and universities are

21. components of the work of the United

22. I talk about Model UN on part of it

23. the other part, what they teach, they

24. you know, concrete issues.

25. I was a teacher and I used to teach

related to the agenda of the UN, and
wanted to know what we do at the United
in trying to find a peaceful solution
4 · to this conflict.

I obliged them and I spoke on that
related to my work at the UN.

Q. · All We would like to show
another video which we will mark Exhibit 9,
excerpt from a video.

10 · (Deposition Exhibit No. 9 was
11 · for identification.)

12 · (Video playing.)

13 · MR. WICK:

14 · Q.. Dr. Mansour, do you recognize that
15 · as an excerpt from a video of the talk
16 · in your November 19, 2020 calendar
17 · entry?

18 · A.. I do.

19 · Q.. Was that a talk given to university
20 · or college students in the United
21 · States?

22 · A.. Yes.

23 · Q.. And where were you when you gave the
24 ·
25 · In my office in the Observer Mission

the State of Palestine, United Nations.

Q. And was one of the purposes of that invitation and giving that talk advocate for the Palestinian cause?

As I said before, when I am invited my capacity as the Observer, Ambassador of State of Palestine for the United Nations, you know, speak in that capacity on the the cause of the Palestinians and

10 Nations.

11 Q. The next entry is November 23, 2020
12 not the next entry -- well, it is the next

13 It states, bureau Do you see
14 entry?

15 A. Yes.

16 Q. Do you know what that means?

17 A. Yes.

18 Q. What is the bureau being referred
19

20 A. It is the Bureau of Committee on the
21 of the Inalienable Rights of the
22 People, it is a General Assembly
23

24 Q. Last item on the page, December 10,
25 2020, titled, all I want for Christmas is a

multilateral system.

Do you know what that event was?

A.. That was a nice There are
Ambassadors, they would discuss -- well,
me, first of all, yes, I That is
question.

Q.. What was the event?

8. A.. As I said, you know, global
that, you know, they dialogue and
10. defending multilateralism, which
11. of that is United Nations, because
12. was a threat against multilateralism from
13. quarters during the few years before
14. date, threatening multilateralism so that
15. group of Ambassadors were brainstorming
16. the ways and means of how to protecting
17. ending and what it stands for as an example
18. multilateralism. And since that event was
19. close to Christmas, then, you know the title
20. it is All I Want for Christmas is a Stronger
21. System.

22. Q.. So I'm not clear, what was the
23. was it a panel discussion or a speech,
24. What is the event?
25. It is a brainstorming on a Zoom

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among a number of Ambassadors.

Q. Can we go to the next page, please,
one after There are two entries

down the page from March 17, 2021 and
one two lines below it on March 18, 2021

Invitation to the Fifth Retreat of the

of Do you see that?

8. A. Yes.

Q. And was that an event that you
10. attended?

11. A. I did not attend that.

12. Q. Did anyone attend from the Observer
13. in your place?

14. A. I asked one of my colleagues
15. attend.

16. Q. And who attended?

17. A. The person who is in charge of
18. related to development.

19. Q. And what is that person's name?

20. A. Abdallah.

21. Q. Is that a first name or a last name?

22. A. Abdallah Abushawesh.

23. Q. And what is the Friends of
24.

25. A. One of the key issues that was under

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for a long period of time at the
is the concept of finance for development.

conference of finance for development
place in Monterrey, Mexico, and every five
a continuation of the same concepts, the
to organize similar One, the
one, I believe Dor in Hefa (phonetic),
another one, Addis Ababa in Ethiopia.

So the Mexican Ambassador, because
10. is the beginning of a very key component
11. the developmental agenda at the United
12. which it is evaded and discussed
13. in the second committee and also in the
14. the sustainable development goals, and
15. form a Friends of Monterrey to keep the
16. of Monterrey on finance for
17. alive.

18. Before the COVID, they used to
19. a number of friends to go and meet in
20. Mexico, over two days, discussing
21. debating issues related to finance for
22.

23. But because of the COVID, this was
24. So that's what this is all
25. Very, very important pillar of our

in the economic and developmental
of the UN is we finance for development
the founding place for this concept was in
Mexico.

Q.. Is the Friends of Monterrey
with the UN?

A.. Of course.

8. Q.. How so?

A.. As I said, you know, that if you
10. at the SDGs 17 Goal and the 169 targets,
11. for development is a very important
12. for eradication of poverty, for better
13. system for humanity, rights of
14. climate change and the rest of all of
15. goals and targets, finance for development
16. a key component for the implementation of
17. which it is the SDGs, and implementing
18. by 2030 is like, you know, the human
19. you know, elements agenda of human

20.
21. So that is one of the pillars of the
22. of the United Nations in the --

23. Q.. Other than the fact that the Friends
24. Monterrey and the United Nations are both
25. in finance for development, is there

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affiliation between the two organizations?

You mean the UN in finance and

Q.. I mean the UN and Friends of

When the Monterrey conference was
it was a line conference.

Q.. And Abdallah Abushawesh attended

9.

10. A.. I believe so.

11. Q.. Do you know where he was when he

12.

13. A.. I believe, most likely, in his

14.

15. Q.. Where is his house?

16. A.. Queens.

17. Q.. Queens?

18. A.. Yes.

19. Q.. And to be clear, the topic discussed

20. the fifth Retreat of the Friends of

21. were UN topics?

22. A.. Absolutely.

23. Q.. Next item I would like to ask about

24. April 6, 2021 Palestinian affairs and the

25. administration, status quo versus

engagement, Dr. Riyadh Mansour,
Observer of the State of Palestine to
United Nations.

Do you see that?

A.. I see it.

Q.. Do you know what that entry is or
it signifies?

8. A.. Is this the university -- Biden

-- if it is a university,

10. University, then this is a lecture

11. a discussion at that institution.

12. Q.. You believe this is a speech you
13. to Bridgewater State University?

14. A.. It could be, I don't remember
15. but I have a feeling that it might be

16.
17. Q.. Would this be a different speech to
18. State University than the one that
19. talked about before on your privilege log?

20. We did not talk about the

21. University yet.

22. Q.. Do you recall, a little while ago
23. we talked about an entry on your privilege
24. that referred to Boston College, and you
25. you believe that that actually was a

State event?

I don't know if it was on that day.
remember, for that university, dates changed
than one time, and it could be that
on April 6, not on that date

Q.. I would like to show you a
that we would like to have marked as
10.

10. (Deposition Exhibit No. 10 was
11. for identification.)

12. (Video playing.)

13. MR. WICK:

14. Q.. do you recognize that
15. an excerpt from a video of, or a speech to
16. State University as reflected in
17. calendar entry?

18. A.. Yes.

19. Q.. This is the April 6, 2021 entry that
20. have been discussing, Palestinian affairs
21. the Biden administration?

22. A.. I believe so.

23. Q.. And you were speaking to U.S.
24. students in that speech; correct?

25. And professors.

1. Q. And And where were you
you gave the presentation?

3. A. My office at the Observer Mission of
State of Palestine, United Nations.

5. Q. And was one of the purposes of that
to advocate for the Palestinian cause?

7. Again, as I said, you know,
are a key component of the
process at the United Nations.

10. universities also have programs, study
11. on the agenda of the UN, including the
12. of Palestine.

13. So when they invite me, they invite
14. in that capacity, and they ask me questions
15. it relates to their education, to their
16. about how the United Nations is with
17. Palestine question.

18. Q. And was one of the purposes of that
19. to advocate for the Palestinian cause to
20. students and professors?

21. Again, as I said, everything that I
22. in my capacity as Permanent Observer of the
23. of Palestine to the United Nations is to
24. for justice for the Palestinians on
25. basis of the UN charter and UN

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--

COURT

I'm

Doctor, you cut out again at the end.

At the end, I

that on the basis of international law and

UN resolutions.

MR. WICK:

8. Q. On -- the next item I would like to
about is May, the very bottom, May 6, 2021,
10. active dialogues with the candidates.
11. if we scroll to the next page, you will see
12. identical entry for May 7, 2021.

13. Do you see those two entries?

14. A. Yes.

15. Q. What was that event?

16. A. You know, another aspect of the work
17. the United Many countries run for
18. For example, every year we have five
19. running for seats in the Security
20. So the candidates, they lobby
21. or groups so that they can get their
22. and to win a seat in the Security

23.
24. Also, we have elections for judges
25. international corporate Countries

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have candidates, they lobby other countries
their And there are so many
at the United Nations, for seats in
Social and Economic Councils, for seats in
Human Rights Council.

So these candidates and their
would lobby others to get their
These are meetings related to

running for office at the UN. And
is another key component of the work of
United Nations.

Q.. And so attending those meetings was
UN business; correct?

A.. Yes.

Q.. And you were attending in your
as Permanent Observer; correct?

A.. Absolutely.

Q.. And what did you discuss with those
candidates?

Basically, they are lobbying us to
our support, if we can vote, get our vote.
we cannot vote, they know that we are
at the UN so that we can say good
about them to those who have the
to vote.

What do I discuss with their
let's say, who are running for seats
the Security That we are active **in**
agenda of the Security There is
of issues related to us in the
Council, specifically, so then they
to prove to me that they **will** be
guided by the principles of the
UN resolutions, international law,
10. these issues are discussed in the Security
11. in order to get my approval and support
12. them and their candidature -- in the
13. business of the UN.

14. Q. Did you ask any questions of the

15.
16. A. Most likely, yes, but I don't

17. It's a general discussion, you know,
18. these candidates, there are so many of
19. covering so many different issues from
20. Security Council, Human Rights Council, so
21. other positions.

22. Q.. There is an entry on May 19, 2021
23. interview with Morning Joe on MSNBC.
24. were interviewed that day, you were
25. live on the Morning Joe program;

1.

A.. That is correct.

Q.. As you might guess, we are going to
you an interview, or a video, excuse me,
we would like to mark as Exhibit 11. We
show you an excerpt from the interview.

(Deposition Exhibit No. 11 was
for identification.)

9.

(Video playing.)

10.

MR. WICK:

11.

Q.. do you recognize that

12.

an excerpt of a -- of your interview with

13.

Morning Joe program notated on your

14.

calendar for May 19, 2021?

15.

A.. I do.

16.

Q.. And where were you when you gave

17.

interview?

18.

A.. In my office in the Observer Mission

19.

the State of Palestine to the United

20.

21.

Q.. Where you are sitting right now;

22.

23.

A.. Correct.

24.

Q.. And you were speaking in that

25.

to the American public; correct?

1. A.. I was speaking to Joe and the lady
is the co-anchor woman and through them, I
to their audience.

4. Q.. And was one of the purposes of
that interview to advocate for the
cause?

7. The purpose of -- the main purpose
that speech was to exert all efforts
to have a cease fire, stop the war
10. was waging against the Palestinian people
11. the occupied territory, particularly in the
12. Strip.

13. And that is -- was a discussion in
14. Security Council at that time and
15. with all members of the Security
16. all members, including the P-5, in
17. to bring about a cease fire as soon as
18. That was the main objective of that
19. which is, in my capacity as the
20. Observer of the State of Palestine to
21. UN, is to do everything possible within the
22. Council, within the United Nations,
23. the entire international community, to
24. a quick cease fire and put an end to that
25. to save lives.

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Q.. Next, May 22, 2021, there is an
for Al Jazeera Do you see

A.. May what, 20?

Q.. May 22, 2021?

A.. I see it.

Q.. Does that entry reflect you were
by Al Jazeera on that date?

A.. Yes.

Q.. I want to show you a video marked as
12.

(Deposition Exhibit No. 12 was
for identification.)

MR. WICK:

Q.. Do you recognize Exhibit 12 as an
from a video of your interview with Al
that's reflected in your calendar on
22, 2021?

A.. That is correct.

Q.. And where were you when you gave
interview?

A.. My In --

Q.. In the Observer Mission?

A.. Observer Mission of the State of
to the United Nations.

Q. Where you're sitting right now;

A. Correct.

Q. And was one of the purposes of that interview to advocate for the Palestinian cause?

A. The main purpose of that interview to show what was happening in the Security in our efforts to have a cease fire, cease fire to the battle that was at that time and to save lives of particularly children in which 66 of were killed in the Gaza Strip during that

Q. Then on May 25, 2021, there is an virtual farewell meeting with ICC

Do you see that?

A. Yes.

Q. What was that event?

A. We are -- it is an event to say to Madam Bensouda, who is the of the ICC, she finished and, you members of the ICC and we are a state member and, in fact, we sit on the Bureau

the ICC, to say goodbye to her and to thank
for her work during that tenure.

Q. And was that meeting virtual, as the
suggests?

A. It was virtual.

Q. Where were you when you attended the
meeting?

A. I did not attend that meeting.

Q. Why is it on your calendar?

A. Because I was supposed to attend but
came I sent one of my colleagues
attend on my behalf.

Q. Who attended on your behalf?

A. Majed Bamy.

Q. Did Mr. Bamy speak at the event?

A. I don't really know.

Q. And what was the purpose of sending
from the Observer Mission to attend?

Because he is the specialist that
you know, legal issues including the

Q. Why did you think it was appropriate
have somebody from the Observer Mission
the State of Palestine at this event
opposed to someone in Ramallah?

1. The ICC has different components to
structure, including the General Assembly
the ICC, which is composed of close to 128
We are one of We are a full
a state party in the ICC.
The way they operate is they
between New York or the Hague. And
of the time in New York, because all of
countries that are members of the ICC have
10. representing them here in and
11. they need to elect the bureau, they do it
12. of the times in New York, this is when we
13. connected for the last two times
14. as a member of the It
15. happen in As I said, it
16. in New York or in the Hague because the
17. of the ICC is in the Hague,
18.
19. Q. So the reason for having somebody
20. the Observer Mission attend was because it
21. be more convenient to have somebody based
22. New York to attend than somebody in
23.
24. A. And the person, my colleague is a
25. from our side, on the ICC affairs,

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he would be -- if I do not go to attend, he
be the appropriate person to go and
me, because he is very familiar with
issues and the discussions including even
goodbye to the prosecutor.

6. Q. The reason for having somebody from
Observer Mission attend this rather than
somebody from Ramallah attend would be
the Observer Mission is in New York and
10. events are frequently in New York?

11. That

12. his It's asked and

13. I know you don't seem to like his
14. but you have asked that question three

15.
16. I'm afraid I don't

17. the It's not about liking

18. not So I will not misstate his

19. I will ask the question again.

20. MR. WICK:

21. Q. What is the purpose of having
22. from the Observer Mission attend this
23. as opposed to somebody from Ramallah?

24. It is not that we are doing
25. different than other countries do.

other members of the ICC, they have their
at the -- or whomever the
designates, from his Mission, attend
meetings in New York.

So we do like everybody -- others
It is not the representative from the
that attend these meetings when they
place in New York It is the Ambassadors
New York When it happens in the

the Ambassador in the Hague attend.

If there is a conference at the
level for the ICC, then the
attends regardless of the location of
the meeting takes This is how
business is done.

Q.. attending a farewell meeting
the ICC prosecutor officially UN business
your view?

A.. Yes, it is.

Q.. To the best of your recollection, on
calendar today, are there any entries
public activities, other than those
involving official UN business
on behalf of the Observer Mission
that are missing from this list?

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1. To the best of my ability, there is
missing from this list.

I think we are -- I
this is probably a good time for a lunch
but before we set that in motion, can we
go off the record for a moment?

7. VIDEOGRAPHER: are now
the The time is 1637 UTC time.
(Discussion held off the

10.
11. VIDEOGRAPHER: are
12. on the The time is 1640 UTC time.
13. I think this is a
14. time to break for lunch, and I guess I
15. ask others involved, what do we need in
16. of time, given that we're virtual; is 45
17. enough?

18. How long do you
19. you have for your remaining

20.
21. Quite a bit.
22. hours.

23. Well, why don't
24. take a full hour.

25. Come back at

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Very good.

3.

VIDEOGRAPHER: · are now
the The time is 1641 UTC time.
(At 12:41 p.m., a lunch recess
taken.)

8.

VIDEOGRAPHER: · are
on the The time is 1743 UTC time.

10.

MR. WICK:

11.

Q.. Good afternoon, Dr. I want
go back to the Observer Mission building.

12.

13.

indicated the Observer Mission owns that

14.

To be clear, the Observer Mission

15.

owned that building at all times since

16.

January 4, 2020; is that correct?

17.

18.

A.. I am sorry, can you repeat the
question, please?

19.

Q.. The question is, has the

20.

Mission owned the Observer Mission

21.

at all times since January 4th of

22.

23.

A.. That is correct.

24.

Q.. I'm going to return to Exhibit 2

25.

very early in the As I

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INTENTIONALLY OMITTED

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1. is

COURT

I'm

Doctor, the what committee?

The first, the

1 committee, which is the disarmament

and he is active in the Security

affairs as part of our team.

He is also our lead representative
all issues related to the ICC, in New York.

10. he also has other responsibilities that I

11.

12. MR. WICK:

13. Q. Does he have an office in the

14. Mission building?

15. A. Yes.

16. Q. Next is Mr. Abou Shawesh. You

17. him a little bit What does

18. he do?

19. Abdallah Abou Shawesh is our lead

20. in the Second It is

21. of the extremely busy committees at the

22. Nations responsible for producing at

23. 40 resolutions annually related to

24. development.

25. Remember, I referred to Friends of

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is one It deals with all
the details of the SDGs, the sustainable
goals and targets, and he is
-- represent us on the Social and Economic
on the economic part of the Social and
Council, and as a -- I forgot to say
in the Second Committee, Third Committee
Fourth Committee, and now in this case of
there are resolutions specific to the
10. of Palestine, at least one resolution
11. the case of Fedat. In the Fourth Committee
12. are eight or seven resolutions adopted
13. or biannually, and they are
14. for negotiating and, you know,
15. these draft resolutions and
16. sponsorships to put them to a vote.

17. Q.. Next on the list is Sahar Abu
18.

19. A.. Sahar Abu Shawesh is a key player
20. Abdallah in the Second Committee division
21. labor as to the term, all of that committee,
22. she covers a number of these One
23. is realignment, the sub item that they
24. with in the Second Committee.

25. So she is extremely helpful and

she leads a group of Ambassadors, on
of the Group of 77 and China, to
with other group, the substance of a
here and resolution there.

Q.. And does she have an office in the
Mission building?

A.. Yes.

8. Q.. And I neglected to ask, Abdallah
Shawesh, does he have an office in the
10. Mission building as well?

11. A.. Yes.

12. Q.. What about Nada Tarbush, I believe
13. mentioned that she has What did she
14. do?

15. A.. She followed mainly the Fifth
16. because the Fifth Committee, during
17. chairmanship of the Group of 77 and China
18. extremely active committee, it deals with
19. budget of the UN and the allocations of
20. to different items, different committees
21. resolutions that have financial
22. and she used to help, you know,
23. some issues related to the First Committee
24. some issues and activities related to the
25. of Fedra.

1. Q. And did she have an office in
Observer Mission building?

3. When she was with us, she had an

5. Q. And next is Sahar Khalil Salem, what
he or she do?

7. A. She has responsibilities with some
in the Security Council because the way
Security Council operates, you have

10. you have the deputy Ambassadors,

11. have the Usually the experts,

12. do a lot of the legwork in terms of

13. of draft They keep

14. with each other details and information

15. the files that they follow, in our case,

16. related to the question of Palestine,

17. cover so many areas, and she is active

18. her colleagues, the experts.

19. In addition to that, she is taking

20. larger responsibility in the Third

21. after the departure of Nadya Rasheed.

22. is mainly specialist on issues related to

23. and children in conflict and she is,

24. know, the liaison between me and the

25. representative of the Security General

children in armed conflict, and she also

us on the item -- questions or

of information in the Fourth Committee,

other responsibilities that I ask of her.

Q. I'm sorry, I think I asked that

in the past Ms. Salem still

for the Observer Mission; correct?

8. A.. Yes.

Q.. And she has an office in the

10. Mission building?

11. A.. Yes.

12. Q.. The next is Nadia Ghannam, who we

13. about with respect to social media.

14. A.. Yes.

15. Q.. What else did she do?

16. A.. She is our representative in a group

17. Asia-Pacific grouping in the United Nations.

18. group of countries is very important group

19. deals with nominations of countries for

20. posts and positions.

21. For example, when we ran to be the

22. of the Group 77 and China, we had to

23. our, you know, nomination to that group,

24. we had to lobby in order to get a unanimous

25. of that group to be the candidate

assume that post on behalf of that group
it went to the Group of 77 and China for
and announcement in the General
that the State of Palestine was, in
year 2009, chair of the Group of 77 and
and she does other responsibilities I
7. ask her.

She has an office in the Mission.

9. Q.. And next is Ghada Hassan

10. What does that individual do?

11. She is, you know, a financial

12. She is responsible for, you know, the

13. the payment of all the bills around

14. building, the automobile, the telephone

15. everything of that nature, and the

16. the regular reports to the finance

17.

18. And she is also our liaison officer

19. the President or ministers come, usually

20. from the State Department contact us

21. her about all the regulations that they

22. from us about the arrival of dignitaries

23. their safety and security.

24. Q.. I believe that you told us

25. that Mr. Alhantouli and Ms. Barghouti

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